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April 9, 2003

The Honorable Ann Veneman  
Secretary, U.S. Department of Agriculture  
Country of Origin Labeling Program  
Agricultural Marketing Service  
Stop 0249 Room 2092-S  
1400 Independence Avenue, SW  
Washington, DC 20250-0249

**Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program**

Dear Secretary Veneman:

I am the Director of Meat & Seafood Merchandising for Giant Food Stores, LLC. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our meat department offers **380 types of whole muscle, 24 types of ground beef, 160 types of pork, and 45 types of lamb products** to consumers on a daily basis. The task of identifying the country in which the underlying animal or animals for each of those products was born, raised and slaughtered is enormous. We must be able to depend on our suppliers for that information and you must hold them accountable through strict enforcement mechanisms. We cannot look at a package of hamburger and determine whether the cow was born and raised in Canada or born in the U.S. and raised in Canada or born, raised and slaughtered in the U.S. Moreover, the operational challenges of labeling each of those items for retail sale on a daily basis are substantial.

As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for cattle, hogs and lamb at birth, feeding and slaughter accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of meat products at retail; and
- Implement reasonable recordkeeping requirements.

Please issue regulations that will be simple to follow and to implement.

Sincerely,

Michael Sonberg  
Director

Meat & Seafood Merchandising



An Ahold USA Company

GIANT Food Stores, LLC  
Operators of  
GIANT Food Stores &  
MARTIN'S Food Markets